

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

VALERIE THOMAS, M.D. and ) Civil Action No. 2:08-cv-01580-PMD  
ROBERT E. THOMAS, JR., P.A., )  
individually and as Personal )  
Representative of the Estate of Benjamin )  
Thomas, )  
)

**GRANTED**

Plaintiffs, ) January 13, 2010

  
PATRICK MICHAEL DUFFY  
United States District Judge

vs. )

Coca-Cola Company, Coca-Cola Bottling )  
Company Consolidated, Piedmont Coca- )  
Cola Bottling Partnership, Joseph James )  
Stevens, Willbrook Links Investment )  
Group, LLC, d/b/a Tradition Golf Club, )  
Palmetto Labor Services, Inc., Nivardo )  
Ramirez, )  
)

**DEFENDANT COCA-COLA**  
**BOTTLING CO. CONSOLIDATED'S**  
**MOTION IN LIMINE REGARDING**  
**ANY SUGGESTION THAT JOSEPH**  
**STEVENS' DRIVER'S LICENSE WAS**  
**SUSPENDED**

Defendants. )  
)

Defendant Coca-Cola Bottling Company Consolidated ("CCBCC") hereby moves, *in limine*, to preclude Plaintiffs from tendering any insinuation at trial that Joseph Stevens' driver's license was ever suspended, either before or during his employment with CCBCC.

Throughout the discovery process, Plaintiffs' counsel has questioned virtually every lay and expert witness as to whether Joseph Stevens' driver's license was suspended shortly before he came to work for CCBCC, implying that it was. As established unequivocally by the Rule 30(b)(6) deposition of the South Carolina Department of Motor Vehicles on December 15, 2009, Joseph Stevens' driver's license was never suspended. (William Wannamaker Dep. Tr. at 5:6-17, 9:13 – 10:2) (attached as Ex. 1).